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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Michele Santopietro, an Individual,
Plaintiff,

vs.

Las Vegas Police Department Officers C.
Howell (Badge 9634), F. Lopez-Rosende
(Badge 8864), and K. Crawford (Badge
10050),
Defendants.

Case No. 2:12-cv-01648-RFB-EJY

**PLAINTIFF’S UNOPPOSED MOTION
TO EXTEND DEADLINE TO FILE
BRIEF RE TIME, PLACE, AND
MANNER JURY QUESTION ISSUE
(FIRST REQUEST)**

Plaintiff Michele Santopietro, by and through her respective undersigned counsel, hereby move unopposed to extend plaintiff’s deadline to file her brief concerning jury issues relating to time, place, and manner restrictions up to and including **Friday, November 15, 2024.**

Plaintiff’s pro bono counsel respectfully requests a brief extension from November 12, 2024 to November 15, 2024 to file her brief concerning the time, place, and manner issues relevant to the pending jury trial Plaintiff’s motion is unopposed and supported by good cause.

On November 3, 2024 this Court directed the parties to file a brief concerning the “jury question issue discussed at the hearing” by November 12, 2024. The jury question issue concerns whether the Clark County Ordinance under which Ms. Santopietro was arrested could be a time, place, and manner restriction, and to what extent the inquiry is a question of law.

1 Plaintiff respectfully requests modest additional time to file her brief. Plaintiff's request is
2 supported by good cause. The last nine days – since the Court's order – have been a proverbial
3 "perfect storm" of deadlines for Plaintiff's counsel. To start, just a few days after this Court's
4 minute order, lead counsel had a long-scheduled Ninth Circuit argument on November 6. She is
5 also lead counsel for a class action in California in which that judge ordered substantial
6 supplemental briefing on October 31 and due November 11 in support of a motion that has been
7 pending since May. Finally, undersigned counsel has two pro bono Ninth Circuit appellate briefs
8 currently due within the next 14 days.

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1 Accordingly, Plaintiff's counsel is not only faced with the general "press of business," but
2 an unlucky convergence of substantial short deadlines, which cannot be rescheduled or extended
3 as a matter of course.

4 Dated: November 12, 2024.

5 SNELL & WILMER L.L.P.

6
7 By: /s/ Kelly H. Dove

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Attorneys for Plaintiff

13 **ORDER**

14 Good cause appearing, Ms. Santopietro's Unopposed Motion is **GRANTED**. Plaintiff's
15 deadline to file her brief concerning jury issues relating to time, place, and manner restrictions is
16 extended up to and including **Friday, November 15, 2024.**

17 **IT IS SO ORDERED.**

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21 **RICHARD F. BOULWARE, II**
22 **UNITED STATES DISTRICT COURT JUDGE**

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DATED this 13 day of November

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **PLAINTIFF'S UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE BRIEF RE TIME, PLACE, AND MANNER JURY QUESTION ISSUE.** by method indicated below:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

DATED November 12, 2024

/s/ Kelly H. Dove
An employee of SNELL & WILMER L.L.P.

4896-2004-1720